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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE
COMPANY,

Defendant.

Case No.: 2:21-cv-00415-KJD-VCF

**STIPULATION AND ORDER
CONTINUING DEADLINE TO REPLY
IN SUPPORT OF MOTION TO
DISMISS (ECF NO. 28), OPPOSE
COUNTERMOTION FOR PARTIAL
SUMMARY JUDGMENT (ECF NO. 32),
AND FILE REPLY IN SUPPORT OF
COUNTERMOTION (ECF NO. 32)**

(FOURTH REQUEST)

Defendant North American Title Insurance Company ("North American") and plaintiff
Bank of America, N.A. ("BANA") hereby agree and stipulate as follows:

1. On March 17, 2023, North American filed its motion to dismiss BANA's
complaint (ECF No. 28);

2. On March 31, 2023, BANA filed a response to North American's motion to
dismiss and filed a countermotion for partial summary (ECF Nos. 31, 32);

3. On June 6, 2023, the Court granted the Parties' third stipulation to extend the
deadlines for North American to reply in support of its motion to dismiss and oppose BANA's
countermotion for partial summary judgment (ECF No. 38);

1 4. North American requests a two-week (14-day) extension of its deadline to reply in
2 support of its motion to dismiss and to oppose BANA's counter-motion for partial summary
3 judgment, through and including Friday, July 21, 2023, to afford North American additional time
4 to respond to the legal arguments set forth in BANA's response and counter-motion, as well as to
5 account for unavailability due to the upcoming holiday;

6 5. BANA requests a two-week (14-day) extension of its deadline to reply in support
7 of its counter-motion, such that BANA's brief would be due 28 days after the filing of North
8 American's opposition and reply.

9 6. Neither North American nor BANA oppose the requested extensions;

10 7. This is the fourth request for an extension by North American and the first request
11 for an extension by BANA, both made in good faith and not for purposes of delay;

12 **IT IS SO STIPULATED** that North American's deadline to reply in support of its motion
13 to dismiss and oppose BANA's counter-motion for partial summary judgment is hereby extended
14 through and including July 21, 2023, and BANA's deadline to reply in support of its
15 counter-motion is due 28 days after the filing of North American's opposition and reply.

16 Dated: July 5, 2023

SINCLAIR BRAUN LLP

17
18 By: /s/-Kevin S. Sinclair
19 KEVIN S. SINCLAIR
20 Attorneys for Defendant
21 NORTH AMERICAN TITLE INSURANCE
22 COMPANY

23 Dated: July 5, 2023

WRIGHT FINLAY & ZAK, LLP

24 By: /s/-Darren T. Brenner
25 DARREN T. BRENNER
26 Attorneys for Plaintiff
27 BANK OF AMERICA, N.A.

28 **IT IS SO ORDERED.**

Dated this 7th day of July, 2023.


KENT J. DAWSON
UNITED STATES DISTRICT JUDGE